

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
LAREDO DIVISION**

**ISMAEL ESCAMILLA, JR.**  
*Plaintiff*

**V.**

**JOHN DOE AND AUTO LINEAS  
AMERICA, S.A. DE C.V.**  
*Defendants*

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**CIVIL ACTION NO. \_\_\_\_\_**

**DEFENDANT AUTO LINEAS AMERICA, S.A. DE C.V.'S  
NOTICE OF CONSENT TO REMOVAL**

Defendant Auto Lineas America, S.A. DE C.V. files this consent to removal under 28 U.S.C. §1446(b)(2).

1. Plaintiff is Ismael Escamilla, Jr.; Defendants are John Doe and Auto Lineas America, S.A. DE C.V.
2. On August 30, 2021, Plaintiff sued Defendants stating that on May 22, 2021, Defendant John Doe improperly parked his vehicle on a traffic lane, without any use of any emergency equipment. Plaintiff asserts Plaintiff's vehicle collided with Defendant John Doe's vehicle, in the 49<sup>th</sup> Judicial District Court, Cause No. 2021CVA001667D1, Webb County, Texas.
3. It is unknown at this time if Defendant John Doe has actually received the notice of suit and accompanying complaint.
4. On December 22, 2021, Defendant Auto Lineas America, S.A. DE C.V. filed a Notice of Removal to Federal Court.
5. Defendant Auto Lineas America, S.A. DE C.V. agrees with the notice of removal and consents to removal of this suit to federal court.

Respectfully submitted,

**CHAVES, OBREGON & PERALES, L.L.P.**

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By: /s/ Douglas E. Chaves

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**ATTORNEYS FOR DEFENDANT**

**AUTO LINEAS AMERICA, S.A. DE C.V.**

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing instrument has been served upon all counsel of record to this proceeding by the manner indicated below, on this 22<sup>nd</sup> day of December 2021.

/s/ Douglas E. Chaves  
DOUGLAS E. CHAVES

**Via e-serve**

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**ATTORNEY FOR PLAINTIFF**  
**ISMAEL ESCAMILLA, JR**

**NOTICE OF ELECTRONIC FILING**

I HEREBY CERTIFY that I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States District Court for the Southern District of Texas on the 22<sup>nd</sup> day of December, 2021.

/s/ Douglas E. Chaves  
Attorney- In Charge